



ENVIRONMENTAL MANAGEMENT DEPARTMENT REVIEW/COMMENT RESOLUTION

Document No. and Title: Ecology Standard Operating Procedures, Draft Final, May 1991

Reviewer(s)' Name(s): U.S. Environmental Protection Agency

Comment No	Page No	Reviewer's Comments	Response
		<u>EPA Comments</u>	
		1. Some SOP's state that field personnel "must" have 40 hr. OSHA training and some SOP's say "should have".	1. The Responsibilities and Qualifications section of all the Ecology SOP's will be made consistent to state that "field personnel must have 40 OSHA health and safety training".
		2. The SOP's do not discuss what should be done if threatened or endangered species are seen in the field.	2. Procedures for documenting special status species follow the community survey procedures presented in the SOPs. Any documentation of T&E species at RFP will become a consideration in the selection of Target Species as specified in the OU Workplans.
		3. Define "flashy nature".	3. Flashy nature is a term commonly used by the USGS to mean the occurrence of immediate increases of flow following a rainfall event.
		4. 10% formalin solution is adequate for preserving benthic samples	4. Where 10% formalin was specified has been replaced with "10% formalin or 70% ethanol. At this time ethanol is being used in the field. This was requested by the laboratories doing taxonomic identifications.

Personnel contacted: _____

ADMIN RECORD

REVIEWED FOR CLASSIFICATION/UCNI

A-SW-000131

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		5. A Hess sampler for benthic sampling is preferable over the Surber sampler because of problems associated with side flow.	5. The low flow conditions in streams at RFP are not likely to introduce side flow problems with the Surber sampler. Therefore, use of a Surber Sampler was considered equivalent to use of a Hess Sampler. Project Field Sampling Plans serve to specify which single type of sampler will be used on a project (SOP5.13) to ensure consistency. At this time the Surber sampler has been selected for all work on present Environmental Evaluations.
		6. SOP 5.3, Form 5.0B needs to include filtration efficiency.	6. Form 5.0B is the Pond Habitat Description Form. It is unclear what was meant by "filtration efficiency" in relation to this form. No action was taken.
		7. The SOP states that fish weight will be done by water displacement. The more common method of using a scale should be considered.	7. The SOP was changed to state use of a weighing scale.
		8. Methods are not described for ensuring that observations of organisms in the distance will be correctly identified by habitat.	8. This section has been revised to be more descriptive.
		9. Protocols for large mammal sampling were not specified.	9. Sampling of large mammals is not planned at this time. Decisions for sampling large mammals for tissue analyses will follow the selection of target species and the assessment of tissue data on lower trophic level organisms. If it is deemed necessary, then it will be specified in an FSP and an SOP will be prepared.

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		10. The text gives an area associated with the 50m x 50m grid for small mammal trapping which is inaccurate.	10. The text was changed to give an approximation of the areas to be covered during small mammal trapping.
		11. SOP 5.7 for Birds is unclear.	11. The bird survey SOP was revised.
		12. Why doesn't SOP 5.8 include protocols for capturing amphibians and reptiles.	12. Sampling of reptiles and amphibians is not planned at this time. Decisions for sampling these species for tissue analyses will follow the selection of target species. If it is deemed necessary, then it will be specified in an FSP and an SOP will be prepared.

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